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March 10, 2022

BY ECF

Judge Andrew L. Carter
United States District Court Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Martinez-Hernandez v. East Wingers Inc. et al.
Case No. 17-cv-2176-ALC

Your Honor:

This office represents Plaintiffs Jose Alberto Martinez Hernandez, Roberto Julian, Agustin Valeriano, and Prixco Soriano (“Plaintiffs”). We write jointly with Defendants pursuant to the Order of December 8th, 2022 in order to update the Court as to the status of the above-captioned case.

As Your Honor is aware, this case was stayed until March 3, 2022 following the passing of Plaintiff Elias Rojas. As no next of kin have indicated they intend to pursue his claims, this firm will not be doing so.

Further, plaintiff Roberto Julian has indicated that he no longer wishes to pursue his claims. As such, the parties plan to execute a stipulation dismissing them, and proceed to move forward with a consent judgment contemplating only the claims of Messrs. Martinez Hernandez, Valeriano, and Soriano, to be filed with the Court and subject to *Cheeks* approval.

We thank the Court for its time and consideration.

Respectfully submitted,

By: /s/Clela Errington

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Attorneys for Plaintiff

cc: Kevin O’Donoghue, Esq.

